

in North Palm Beach, FL, 33408 - 0000, USA, which makes the two parties' citizens of different states and the amount *in controversy* exceeds \$75,000. Specifically, Dora L. Adkins resides in Fairfax County with a mailing address of P.O. Box 3825, Merrifield, VA 22116 and the Defendant, Driftwood Special Servicing, LLC's Principal Office is located at 11770 N US HWY 1 STE 202, North Palm Beach, FL, 33408 - 0000, USA. (**EXHIBIT #1**: See, Copy of Business Entity Details for Driftwood Special Servicing, LLC, Proof of Diversity). The Diversity of citizenship between the Plaintiff, Dora L. Adkins and the Defendant, Mercedes-Benz USA, LLC is completely different; as well as the amount *in controversy* is for \$350,000 Dollars and this Honorable Court holds jurisdiction over the Complaint.

Plaintiff is asking for in Count #1: Intentional Infliction of Emotional Distress – TWO-HUNDRED MILLION DOLLARS; and Count #2: Gross Negligence and TWO-HUNDRED MILLION DOLLARS; and a Claim for Punitive Damages – TWO-HUNDRED MILLION DOLLARS, a total of SIX-HUNDRED MILLION DOLLARS. The *in-controversy* amount for Punitive Damages is \$350,000. As a matter of law, Plaintiff established she has suffered an extreme & debilitating injury of emotional distress damages that satisfy the \$75,000 amount *in controversy* limit. Virginia cap on punitive damages. ... Virginia statute § 8.01-38.1 places a cap of \$350,000 on punitive damages courts

may award to punish wrongdoers. Plaintiff will use the Virginia cap on punitive damages to meet the \$75,000 requirement for the amount *in controversy* limit.

INTRODUCTION TO PRIMA FACIE CASE:

1. Plaintiff entered into a Contract with the Defendant, Driftwood Special Servicing, LLC, owner, and operator for The Westin Tysons Corner on December 31, 2021, through January 5, 2021; and **AFTER BEING STRANDED OUTDOORS FOR SIXTEEN-DAYS AND FIFTEEN-NIGHTS AND/OR 384 HOURS FROM DECEMBER 16, 2021, THROUGH DECEMBER 31, 2021; AND AFTER THREE-ATTEMPTED MURDERS OF THE PLAINTIFF WHILE LIVING OUTDOORS. THERE WAS AN ATTEMPTED PREMEDITATED MURDER OF THE PLAINTIFF BY THE DEFENDANT, DRIFTWOOD SPECIAL SERVICING, LLC BY SEPTIC POSIONING FROM A BROKEN TOILET INSIDE GUEST ROOM #438; AND GOD ONLY KNOWS WHAT OTHER GERMS AND BACTERIA PLAINTIFF WAS EXPOSED TO: = “GOD’S DEVINE INTERVENTION”**

2. The Westin Tysons Corner Hotel is located at 5000 Seminary Rd, Alexandria, VA 22311; Phone: (703) 845-1010. (**EXHIBIT #2**: See, Copy of Plaintiff’s Reservations from December 31, 2021, through January 5, 2021, for The Westin Tysons Corner).

3. Plaintiff checked into The Westin Tysons Corner Hotel on December 31,

2021, with swollen feet, ankles, and legs from water retention and lack of movement **AFTER BEING STRANDED OUTDOORS FOR SIXTEEN-DAYS AND FIFTEEN-NIGHTS AND/OR 384 HOURS FROM DECEMBER 16, 2021, THROUGH DECEMBER 31, 2021; AND AFTER THREE-ATTEMPTED MURDERS OF THE PLAINTIFF WHILE LIVING OUTDOORS.** Plaintiff's three severe and debilitating injuries of swollen feet, ankles, and legs from water retention and lack of movement repeatedly occur when Plaintiff is forced to live outdoors. **Plaintiff desperately needed sleep inside a bed, to elevate the legs, and to drink plenty of water.**

4. While Plaintiff was at the Front Desk, Plaintiff requested from Rahan, Front Desk Agent and/or Supervisor for The Westin Tysons Corner Hotel some bottled water; ordered 4 sets of sheets; 4-sets of pillowcases; toilet paper and facial tissue; 4-sets of bath towels; 4-sets of hand towels; and 4-wash clothes. Rahan, Front Desk Agent and/or Supervisor indicated that Plaintiff's order that would go through the Housekeeping Department might not be filled because The Westin Tysons Corner Hotel was busy and the additional linens, towels, and toiletries might not be available.

5. On December 31, 2021, and/or as soon as Plaintiff got off the elevator onto the 4th Floor and walked towards Guest Room #438, there was a horrific smell both in the hallway and inside Guest Room #438. Shiwainesh, Housekeeper for

The Westin Tysons Corner Hotel came immediately to Guest Room #438 with the items Plaintiff requested along with some air freshener for the disgusting smell inside Guest Room #438. Plaintiff asked the employee Shiwainesh, Housekeeper where the smell was coming from and Shiwainesh, indicated it was from the work the Engineer was completing. Plaintiff saw the Engineer working nearby to Guest Room #438 and on the 4th floor.

6. Plaintiff immediately sent an email to Mik Mahdavi, General Manager (GM) for The Westin Tysons Corner Hotel. (EXHIBIT #3; #4; #5: 6: See, Copy of Emails Sent to Mik Mahdavi, General Manager (GM) for The Westin Tysons Corner Hotel).

EXHIBIT #2: EMAIL FROM PLAINTIFF:

Dirty Carpet Inside Guest Room #438 and Very Offensive Smells on the 4th Floor

Fri, Dec 31, 2021, 7:06 pm

(doraadkins7@aol.com)To:Mmahdaui@dhmhotels.com + 1 more Details
December 31, 2021

Dear Mr. Mahdavi:

I just checked into the Westin Hotel Tyson's and while I requested a Guest Room without a pet being inside the Guest Room. My request could not be accommodated by Rahan. The carpet has **large dirty spots** on it; **visible lint** left from not proper vacuuming; and the hallway smells horrific to the point of making me vomit.

I have had no place to stay in the pass 16-days and nights and I desperately need sleep because my feet, ankles, and legs, are swollen from water retention and the lack of proper movement of the body.

I was able to switch out the bed linens because NOTHING can get onto my skin.

A very nice Housekeeper assisted me with the additional linen requests and sprayed the Guest Room down with some air freshener. She indicated that she too smelled the very offensive and disgusting smell and that it was coming from the Engineer who was working in the Hallway when I arrived to Guest Room #438. Why would such offensive work need to be completed late into the evening on New Year Eve?

Sincerely,

Dora Adkins

EXHIBIT #2: FROM PLAINTIFF (RE-SENT BECAUSE OF WRONG EMAIL ADDRESS:

Fwd: Dirty Carpet Inside Guest Room #438 and Very Offensive Smells on the 4th Floor

Fri, Dec 31, 2021, 7:08 pm

(doraadkins7@aol.com)To:Mmahdavi@dhhmhotels.com + 1 more Details
WRONG EMAIL ADDRESS

-----Original Message-----

From: doraadkins7@aol.com

To: Mmahdavi@dhhmhotels.com <Mmahdavi@dhhmhotels.com>

Cc: DoraAdkins7@aol.com <DoraAdkins7@aol.com>

Sent: Fri, Dec 31, 2021 7:06 pm

Subject: Dirty Carpet Inside Guest Room #438 and Very Offensive Smells on the 4th Floor

December 31, 2021

Dear Mr. Mahdavi:

I just checked into the Westin Hotel Tyson's and while I requested a Guest Room without a pet being inside the Guest Room. My request could not be accommodated by Rahan. The carpet has **large dirty spots** on it; **visible lint** left from not proper vacuuming; and the hallway smells horrific to the point of making me vomit.

I have had no place to stay in the pass 16-days and nights and I desperately need sleep because my feet, ankles, and legs, are swollen from water retention and the lack of proper movement of the body.

I was able to switch out the bed linens because NOTHING can get onto my skin.

A very nice Housekeeper assisted me with the additional linen requests and sprayed the Guest Room down with some air freshener. She indicated that she too smelled the very offensive and disgusting smell and that it was coming from the Engineer who was working in the Hallway when I arrived to Guest Room #438. Why would such offensive work need to be completed late into the evening on New Year Eve?

Sincerely,

Dora Adkins

EXHIBIT #3: FROM PLAINTIFF:

Fwd: Dirty Carpet Inside Guest Room #438 and Very Offensive Smells on the 4th Floor

Fri, Dec 31, 2021, 7:56 pm

(doraadkins7@aol.com)To:Mmahdavi@dhmhotels.com + 1 more Details

Dear Mr. Mahdavi:

The worst was about to come my way inside Guest Room #438.

I sent you an email and prepared to go to sleep but before such I went to take a shower and the bathroom shower is not working nor is the commode located in the bathroom with something in it that has not been flushed. ARE YOU KIDDING ME!!! I CLOSED THE DOOR AND WILL HAVE NO PLACE TO WASH MY FACE AND BRUSH MY TEETH.

Rahan when asked if Guest Room # 438 had pets on the floor Rahan indicated "No." THERE IS A BARKING DOG ON THE 4TH FLOOR.

Sincerely,

Dora Adkins

NOTE: I AM ATTEMPTING TO GET RID OF THE SWELLING IN MY LEGS, FEET AND ANKLES BEFORE HEART PROBLEMS EXIST.

Sincerely,

Dora Adkins

NOTE: DEAR GM, PLEASE HELP ME WITH A GUEST ROOM WITHOUT THESE ISSUES.

EXHIBIT #4: FROM GM:

Re: Dirty Carpet Inside Guest Room #438 and Very Offensive Smells on the 4th Floor

Sat, Jan 1, 2022, 9:18 am

Mik Mahdavi (mmahdavi@dhmhotels.com)To:you + 1 more Details

Thank you for your feedback. I have asked my FOM who is at the hotel to investigate the situation. I am so sorry to hear about the issues you have pointed out. I can assure you that this is not how we present ourselves and on the contrary most of our guest see the Westin as their home away from home.

Kind regards, and Happy New Year.

Be Well,
Mik Mahdavi
General Manager
THE WESTIN TYSONS CORNER
7801 Leesburg Pike
Falls Church, VA 22043

USA
westin.com/tysonscorner
D +1 703.394.2121 T +1 703.893.1340 F +1 703.893.3479
WEBSITE | FACEBOOK | TWITTER | OFFERS | MEETINGS

EXHIBIT #5: FROM PLAINTIFF:

From: doraadkins7@aol.com <doraadkins7@aol.com>
Sent: Friday, December 31, 2021 7:56:11 PM
To: Mik Mahdavi <mmahdavi@dhmhotels.com>
Cc: DoraAdkins7@aol.com <DoraAdkins7@aol.com>
Subject: Fwd: Dirty Carpet Inside Guest Room #438 and Very Offensive Smells on the 4th Floor

CONFIDENTIAL EMAIL: Re: Dirty Carpet Inside Guest Room #438 and Very Offensive Smells on the 4th Floor

Sat, Jan 1, 2022, 11:09 am

(doraadkins7@aol.com)To:mmahdavi@dhmhotels.com + 1 more Details

CONFIDENTIAL EMAIL:

January 1, 2022

Dear Mr. Mahdavi;

Please do not forward my confidential email to your management team. I do not want my email address provided to someone that I did not provide my personal information to.

The facts in the emails to you were **NOT FEEDBACK**, BUT VERY SERIOUS AND FACTUAL ISSUES WHILE I AM IN DESPERATE NEED FOR SLEEP TO RID THE SWOLLEN LEGS, ANKLES, AND FEET.

How other Guests view the Westin Tyson's Hotel has **NOTHING TO DO WITH THESE VERY SERIOUS AND FACTUAL ISSUES LOCATED INSIDE GUEST ROOM #438.**

Your FOM need not waste time investigating when a Housekeeper for Westin Tyson's Hotel was present outside on the 4th floor and inside Guest Room #438; and who informed me that the horrific smell was coming from what the **Engineer was doing in the bathroom.** I WAS SO TIED AND SLEEPY AFTER 16-

DAYS, IT WASN'T UNTIL JANUARY 1, 2022, THAT I REALIZE THE **BATHROOM WAS THE BATHROOM LOCATED IN GUEST ROOM #438, BECAUSE PARTS TO THE SHOWER ARE LEFT SITTING ON THE SIDE OF THE BATHTUB ON A PAPER TOWEL.**

Sincerely,

Dora Adkins

PRIMA FACIE CASE:

FACTS OF THE COMPLAINT:

7. It is a fact that Plaintiff was very concerned about Plaintiff's swollen feet, ankles, and legs from water retention and lack of movement **AFTER BEING STRANDED OUTDOORS FOR SIXTEEN-DAYS AND FIFTEEN-NIGHTS AND/OR 384 HOURS FROM DECEMBER 16, 2021, THROUGH DECEMBER 31, 2021; AND AFTER THREE-ATTEMPTED MURDERS OF THE PLAINTIFF WHILE LIVING OUTDOORS.** It is a fact that Plaintiff knows Plaintiff could die from not having enough blood flow to Plaintiff's Heart resulting from the swollen feet, ankles, and legs from water retention and the lack of movement. The issue is very serious; thus, provides the reason for Plaintiff's Emergency Complaint.

8. It is a fact that as soon as Plaintiff got off the elevator from check-in at the Front Desk for The Westin Tysons Corner Hotel, Plaintiff smelled the horrific smell that made Plaintiff vomit inside a bag because the toilet was not working inside Guest Room #438.

9. It is a fact that **AFTER BEING STRANDED OUTDOORS**

FOR SIXTEEN-DAYS AND FIFTEEN-NIGHTS AND/OR 384 HOURS

FROM DECEMBER 16, 2021, THROUGH DECEMBER 31, 2021; AND

AFTER THREE-ATTEMPTED MURDERS OF THE PLAINTIFF WHILE

LIVING OUTDOORS: Plaintiff was sold Guest Room #438 that should have already been placed out-of-order because the commode/toilet would not flush meaning no working toilet inside Guest Room #438; no water in the shower inside Guest Room #438 and parts either from the commode/toilet or the shower were placed on a paper towel on the edge of the bathtub.

10. It is a fact that Plaintiff immediately became sick from the smell with vomiting and had an extreme and debilitating Migraine Headache while still very concerned about Plaintiff's swollen feet, ankles, and legs. **AFTER BEING STRANDED OUTDOORS FOR SIXTEEN-DAYS AND FIFTEEN-NIGHTS AND/OR 384 HOURS FROM DECEMBER 16, 2021, THROUGH DECEMBER 31, 2021; AND AFTER THREE-ATTEMPTED MURDERS OF THE PLAINTIFF WHILE LIVING OUTDOORS:** Plaintiff was not processing the gross negligence found in Guest Room #438 because Plaintiff severely needed sleep and a shower.

11. It is a fact that Plaintiff stripped the bed inside Guest Room #438 to find very dirty and used bed linens by the prior Guests with blood stains on its wool mattress covering. Plaintiff covered one of the Queen size bed mattresses

with four-clean fitted mattress covering and 4-flat sheets; and Plaintiff also covered two of the four pillows with 6-clean pillowcases.

12.It is a fact that Plaintiff **AFTER BEING STRANDED OUTDOORS FOR SIXTEEN-DAYS AND FIFTEEN-NIGHTS AND/OR 384 HOURS FROM DECEMBER 16, 2021, THROUGH DECEMBER 31, 2021; AND AFTER THREE-ATTEMPTED MURDERS OF THE PLAINTIFF WHILE LIVING OUTDOORS:** Plaintiff total attention was to rid the swelling of Plaintiff's swollen feet, ankles, and legs. The swelling went away in the feet, ankles, and legs but extensive bruises and/or accumulated blood surrounded both ankles on the left and right legs and on top of Plaintiff's feet. Plaintiff focus was also on getting rid of the bruising and/or accumulated blood and **IS THE ONLY REASON PLAINTIFF STAYED IN GUEST ROOM #438.**

13.It is a fact that on January 3, 2022, Plaintiff reported and physically pointed out all of the issues inside Guest Room #438 to Evelln and Paniagua sent to Plaintiff by Rahan, Front Desk Agent and/or Supervisor as representative for housekeeping management for The Westin Tysons Corner Hotel after Plaintiff's request.

COUNT #1: ELEMENTS FOR INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS AND FACTS TO SUPPORT INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS:

ELEMENTS FOR INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS:

- Extreme or outrageous conduct that
- Intentionally or recklessly causes
- Severe emotional distress (and possible also bodily harm)

FACTS TO SUPPORT INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS:

Extreme and Outrageous Conduct:

14. Plaintiff realleges paragraphs 1 through 13 as though fully set forth herein.

15. The Defendant, Driftwood Special Servicing, LLC extreme and outrageous conduct began when Plaintiff was SOLD Guest Room #438 knowing that Guest Room #438 was without a working commode and/or toilet; something left unflushed in the non-working commode and/or toilet; and the shower did not have any water for a shower.

16. The Defendant, Driftwood Special Servicing, LLC extreme and outrageous conduct including exposing the Plaintiff to possible septic poisoning because the smell was coming from the commode and/or toilet, SOLD Guest Room #438 to Plaintiff that had not been properly cleaned for a Guest. Guest Room #438 had uncleaned bed linens and large dirty stains and/or pet stains on the carpet, smears on its glass surfaces, and really thick dust accumulated on the nightstands, lamps, and headboard of the bed.

Intent/Recklessness:

17. Plaintiff realleges paragraphs 1 through 13 as though fully set forth herein.

18. In addition to acting in an extreme and outrageous manner, Defendant, Driftwood Special Servicing, LLC acted with intent or recklessness because The Westin Tysons Corner Hotel had clear knowledge that the septic smells could cause septic poisoning to the Plaintiff but did not block the sale of a Guest Room to the Plaintiff on the 4th floor; whereby, the Engineer was working either inside Guest Room #438 and/or inside nearby Guest Room's bathrooms on the 4th floor.

19. Defendant, Driftwood Special Servicing, LLC acted with intent or recklessness because The Westin Tysons Corner Hotel could have SOLD Plaintiff any other Guest Room at The Westin Tysons Corner Hotel choosing from 407 recently renovated Guest Rooms not to include the Guest Rooms on the 4th floor and Guest Rooms sold to other Guests on a busy New Year Eve in the total of 407 Guest Rooms.

20. Defendant, Driftwood Special Servicing, LLC acted with intent or recklessness because after Plaintiff sent an email to Mik Mahdavi, General Manager (GM) for The Westin Tysons Corner Hotel on Friday December 31, 2021, Mik Mahdavi, GM responded on January 1, 2022, to Plaintiff's email indicating he was not on the property but did not assist the Plaintiff with the issues that were reported to him. Plaintiff remained inside Guest Room #438 for

December 31, 2021, January 1, 2022, and January 2, 2022, and was sick for three days and nights but was able to rid of all of the swelling and most of the bruising and/or blood accumulation.

Severe Emotional Distress:

21.Plaintiff realleges paragraphs 1 through 13 as though fully set forth herein.

22.In the Plaintiff's claim for Intentional Infliction, the Plaintiff's Emotional Distress in response to extreme and outrageous behavior reached a "severe" level. Plaintiff can prove an injury that the Emotional Distress she experienced reached a sufficient level of severity, which justifies an award for Intentional Infliction against the Defendant, Driftwood Special Servicing, LLC because Plaintiff stayed in Guest Room #438 without a working commode and/or toilet and a working shower.

23.The Plaintiff can prove an injury that the Emotional Distress she experienced reached a sufficient level of severity, which justifies an award for Intentional Infliction against Defendant, Driftwood Special Servicing, LLC. The wanton and willful conduct was caused by the following: Plaintiff had no way to know Plaintiff would be exposed to septic poisoning coming from a broken commode and/or toilet when Plaintiff paid for a Guest Room at The Westin Tysons Corner Hotel on December 31, 2021.

24. Plaintiff' did not realize the gravity of the physical injuries and the emotional distress until Plaintiff realized Plaintiff is highly allergic to septic poisoning and died from the same and/or very similar injury in the case of *Dora L. Adkins v. The Ritz Carlton Hotel Company of Virginia* in the Year of 2014. This potential lawsuit is a copy of *Dora L. Adkins v. Davidson Company Hotel* that is presently before the Supreme Court of Virginia.

25. The intensity and duration of the emotional distress also contribute to Plaintiff's severity, in that, Plaintiff become bed-ridden and/or out of commission when Plaintiff suffered severe Migraine Headaches, violent vomiting and an overall of wondering when this nightmare will end.

26. Defendant, Driftwood Special Servicing, LLC, alleged "wrongdoer had specific purpose of inflicting emotional distress or where he intended his specific purpose of inflicting emotional distress would likely result," because of the following reasons: There would be no reason to sale a Guest Room on the 4th floor at The Westin Tysons Corner Hotel to the Plaintiff that needed to be placed out-of-order for a non-working commode and/or toilet and a non-working shower.

27. Defendant, Driftwood Special Servicing, LLC, alleged "liability has been found where the conduct has been so outrageous in character, and so extreme in degree, as to go beyond all possible bounds of decency, and to be regarded as atrocious, and utterly intolerable in a civilized society," because of the

following reasons: Not only should Guest Room #438 located on the 4th floor been placed out-of-order, the Engineer should have completed his work earlier on December 31, 2021 and/or placed the Guest Room #438 out-of-order.

28. Defendant, Driftwood Special Servicing, LLC, alleged “liability arises only when the emotional distress is extreme, and only where the distress inflicted is so severe that no reasonable person could be expected to endure it,” because of the following: **AFTER BEING STRANDED OUTDOORS FOR SIXTEEN-DAYS AND FIFTEEN-NIGHTS AND/OR 384 HOURS FROM DECEMBER 16, 2021, THROUGH DECEMBER 31, 2021; AND AFTER THREE-ATTEMPTED MURDERS OF THE PLAINTIFF WHILE LIVING OUTDOOR**, Plaintiff did not expect to pay for a Guest Room in which Plaintiff could not use the commode and/or toilet and to take a shower after a desperate need to do so; as well as having an allergic reaction after being exposed to germs and bacteria left behind from an unclean Guest Room.

ELEMENTS FOR GROSS NEGLIGENCE:

- An individual must owe a duty to the accuser.
- The individual must fail to perform such duty.
- The accuser must suffer harm or injury.
- Such harm or injury must be linked to the failure of the other party to perform his duty.

A negligent action may be tantamount to gross negligence if the following elements are also present in it:

- The individual acting in negligence was aware of the potential consequences of his action or omission.
- He committed the negligence intentionally in order to cause harm to the accuser.

FACTS TO SUPPORT GROSS NEGLIGENCE:

29. Plaintiff realleges paragraphs 1 through 13, as though fully set forth herein.

30. Defendant, Driftwood Special Servicing, LLC owed a duty to Plaintiff as a Guest in The Westin Tysons Corner Hotel but violated and/or failed to perform that duty when the Plaintiff was sold a Guest Room that should have been placed out-of-order.

31. Defendant, Driftwood Special Servicing, LLC caused the Plaintiff as a Guest in The Westin Tysons Corner Hotel to suffer harm of emotional and numerous physical injuries of vomiting and severe and debilitating Migraine Headaches which in order to get rid of Plaintiff must take Excedrin for Migraines which caused the Plaintiff rectal bleeding.

32. Defendant, Driftwood Special Servicing, LLC allegedly caused the Plaintiff as a Guest in The Westin Tysons Corner Hotel to suffer emotional and numerous physical injuries of severe and debilitating injuries.

33. Defendant, Driftwood Special Servicing, LLC allegedly caused

the Plaintiff as a Guest in The Westin Tysons Corner Hotel fear of dying at the hands of the Defendant, Driftwood Special Servicing, LLC.

34. The Harm and Injuries to Plaintiff are clearly linked to the Defendant, Driftwood Special Servicing, LLC because all of the injuries took place immediate upon entering the hallway of the 4th floor to Guest Room #438 and once inside Guest Room #438.

35. Defendant, Driftwood Special Servicing, LLC allegedly caused the Plaintiff as a Guest in The Westin Tysons Corner Hotel enormous pain and suffering while carefully problem solving about “how-to” stay alive.”

CLAIM #1: ELEMENTS FOR PUNITIVE DAMAGES AND FACTS TO SUPPORT PUNITIVE DAMAGES:

ELEMENTS FOR PUNITIVE DAMAGES:

36. Plaintiff realleges paragraphs 1 through 12 as though fully set forth herein.

37. Punitive Damages may only be awarded where there is misconduct or actual malice, or such recklessness or negligence as to evince a conscious disregard of the rights of others. *Giant of Virginia v. Pigg*, 207 Va. 679, 685-86 (1967).”

38. All of the elements for Punitive Damages were met by the

facts in Plaintiff's Complaint from a 3-day stay at The Westin Tysons Corner Hotel because there would be NO REASON to sale a Guest a Guest Room; whereby, the Guest would be exposed to septic chemicals and have a broken toilet and no shower.

39. Defendant, Driftwood Special Servicing, LLC misconduct, or actual malice, or such recklessness or negligence evinced a conscious disregard of the rights of Plaintiff while staying at The Westin Tysons Corner Hotel because the Defendant, Driftwood Special Servicing, LLC shows a disrespect for Plaintiff's life when the Defendant caused the Plaintiff to suffer from septic poisoning.

40. Defendant, Driftwood Special Servicing, LLC's misconduct, or actual malice, or such recklessness or negligence evinced a conscious disregard because even on January 1, 2022, January 2, 2022, and January 3, 2022, Defendant, Driftwood Special Servicing, LLC had an opportunity to prevent Plaintiff from not having a working toilet and a working shower.

SUMMARY:

41. Plaintiff was subjected to actual malice, or such recklessness or negligence as to evince a conscious disregard of the rights of Plaintiff with intentional harmful and unlawful and/or criminal actions. The Defendant, Driftwood Special Servicing, LLC did not reach out to the Plaintiff. On Monday, January 3, 2022, Plaintiff was moved to another Guest Room claiming a Group had

previously reserved Guest Room #438 included in a block of Guest Rooms on the 4th floor.

42. The Defendant, Driftwood Special Servicing, LLC., allowed the Plaintiff to move to Guest Room #638 on Monday, January 3, 2022, and Plaintiff only moved to Guest Room #638 because of a major snowstorm and no place for the Plaintiff to go; and the continued process of diminishing the bruises and/or blood accumulation on Plaintiff's feet and ankles.

43. WHEREFORE, this Plaintiff claims SIX-HUNDRED MILLION DOLLARS and whatever else this Honorable Court deems appropriate.

Respectfully Yours,

A handwritten signature in black ink, appearing to read "Dora L. Adkins". The signature is fluid and cursive, with the first name "Dora" being more prominent.

Dora L. Adkins, *pro se*

ADDENDUM

COMPENSATORY DAMAGES:

1. "In accord with the foregoing, Plaintiff claim damages against Defendant as follows:"

A. Compensatory Damages: TOTAL = Approximately \$1,027.00

Hotel cost including U.S. Dollars and not including the equivalence cost for the use of Hilton Honors Reward Points (NOT INCLUDED):

(i) “Cost for Medicine for Migraine Headaches \$7.00

Note: The Plaintiff reserves the right to amend the compensatory (which was not added in) and the amounts for Intentional Infliction of Emotional Distress; Gross Negligence; and for Punitive Damages as a *Prima Facie* Case.

B. DAMAGES: TWO-HUNDRED-MILLION DOLLARS for: Count #1:

Intentional Infliction of Emotional Distress; TWO-HUNDRED MILLION

DOLLARS for Count #2: Gross Negligence and TWO-HUNDRED MILLION

DOLLARS for a Claim for Punitive Damages.

Damages - means the amount of compensation the Plaintiff is seeking in Count #1:

Intentional Infliction of Emotional Distress; Count #2: Gross Negligence; and a


Claim for Punitive Damages as a *Prima Facie* Case.

JURY DEMANDED

2. Trial by jury is demanded.

WHEREFORE, Plaintiff demands judgment against the defendant, in the TOTAL amount of SIX-HUNDRED-MILLION DOLLARS: Intentional Infliction of Emotional Distress – TWO-HUNDRED MILLION DOLLARS; Gross Negligence – TWO-HUNDRED MILLION DOLLARS; Punitive Damages – TWO-HUNDRED MILLION DOLLARS; as a *Prima Facie* Case and/or whatever else the Court deem appropriate.

Respectfully Yours,


Dora L. Adkins, *pro se*

Dora L. Adkins
P.O. Box 3825
Merrifield, Virginia 22116
DoraAdkins7@aol.com
No Telephone

Note: There is no way to contact the Plaintiff; except, by U.S. Mail to the above address because there is no working telephone number(s) to provide.

CERTIFICATE OF SERVICE:

I certify that on January 5, 2022, I filed a "Motion for Leave from the Court to File an Emergency Complaint," and "An Emergency Complaint," along with the listed Exhibits against the Defendant, Driftwood Special Servicing, LLC.

REGISTERED OFFICE ADDRESS:

CORPORATION SERVICE COMPANY

Registered Office Address:

100 Shockoe Slip Fl 2,
Richmond, VA, 23219 - 4100, USA

PRINCIPAL OFFICE ADDRESS:

11770 N US HWY 1 STE 202
NORTH PALM BEACH, FL, 33408 - 0000, USA

PHYSICAL ADDRESS:

The Westin Tysons Corner
7801 Leesburg Pike
Falls Church, VA 22043
(703) 893-1340

Mik Mahdavi
General Manager
THE WESTIN TYSONS CORNER

7801 Leesburg Pike
Falls Church, VA 22043
USA
westin.com/tysonscorner
D +1 703.394.2121
T +1 703.893.1340
F +1 703.893.3479

Respectfully Yours,



Dora L. Adkins, *pro se*

EXHIBITS:

EXHIBIT #1: *See*, Copy of Business Entity Details for Driftwood Special Servicing, LLC, Proof of Diversity

EXHIBIT #2: *See*, Copy of Plaintiff's Reservations from December 31, 2021, through January 5, 2021, for The Westin Tysons Corner

EXHIBIT #3: *See*, Copy of Email from Plaintiff to Mik Mahdavi, General Manager (GM) for The Westin Tysons Corner Hotel

EXHIBIT #4: *See*, Copy of Re-sent Email from Plaintiff to Mik Mahdavi, General Manager (GM) for The Westin Tysons Corner Hotel

EXHIBIT #5: *See*, Copy of Email from Mik Mahdavi, General Manager (GM) for The Westin Tysons Corner Hotel

EXHIBIT #6: *See*, Copy of Email from Plaintiff to Mik Mahdavi, General Manager (GM) for The Westin Tysons Corner Hotel

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

DORA L. ADKINS,

Plaintiff,

v. Civil Action No.:

DRIFTWOOD SPEICAL SERVICING, LLC,

Defendant.

CERTIFICATION

I declare under penalty of perjury that:

No attorney has prepared or assisted in the preparation of this document.

Dora L. Adkins

Name of Pro Se Party (Print or Type)

Executed on January 5, 2022 (Date)

OR

Dora L. Adkins

(Name of Attorney)

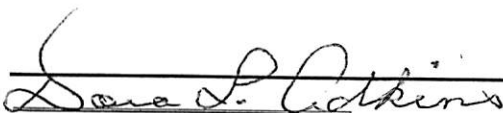
No Telephone Number

(Telephone Number of Attorney)

Prepared or assisted in preparation of this document.

Dora L. Adkins

Name of Pro Se Party (Print or Type)

A handwritten signature in cursive script, appearing to read "Dora L. Adkins", is written over a horizontal line.

Signature of Pro Se Party (Print or Type)

Executed on January 5, 2022 (Date)

CONFIDENTIAL EMAIL: Re: Dirty Carpet Inside Guest Room #438 and Very Offensive Smells on the 4th Floor

Sat, Jan 1, 2022, 11:09 am

(doraadkins7@aol.com) To: mmahdavi@dhmhotels.com + 1 more Details

CONFIDENTIAL EMAIL:

January 1, 2022

Dear Mr. Mahdavi;

Please do not forward my confidential email to your management team. I do not want my email address provided to someone that I did not provide my personal information to.

The facts in the emails to you were **NOT FEEDBACK**, BUT VERY SERIOUS AND FACTUAL ISSUES WHILE I AM IN DESPERATE NEED FOR SLEEP TO RID THE SWOLLEN LEGS, ANKLES, AND FEET.

How other Guests view the Westin Tyson's Hotel has **NOTHING TO DO WITH THESE VERY SERIOUS AND FACTUAL ISSUES LOCATED INSIDE GUEST ROOM #438.**

Your FOM need not waste time investigating when a Housekeeper for Westin Tyson's Hotel was present outside on the 4th floor and inside Guest Room #438; and who informed me that the horrific smell was coming from what the **Engineer was doing in the bathroom.** I WAS SO TIED AND SLEEPY AFTER 16-

DAYS, IT WASN'T UNTIL JANUARY 1, 2022, THAT I REALIZE THE **BATHROOM WAS THE BATHROOM LOCATED IN GUEST ROOM #438, BECAUSE PARTS TO THE SHOWER ARE LEFT SITTING ON THE SIDE OF THE BATHTUB ON A PAPER TOWEL.**

Sincerely,

Dora Adkins

-----Original Message-----

From: Mik Mahdavi <mmahdavi@dhmhotels.com>

To: doraadkins7@aol.com <doraadkins7@aol.com>

Cc: doraadkins7@aol.com <doraadkins7@aol.com>; kpatterson@westintyson.com <kpatterson@westintyson.com>

Sent: Sat, Jan 1, 2022 9:18 am

Subject: Re: Dirty Carpet Inside Guest Room #438 and Very Offensive Smells on the 4th Floor

Thank you for your feedback. I have asked my FOM who is at the hotel to investigate the situation. I am so sorry to hear about the issues you have pointed out. I can assure you that this is not how we present ourselves and on the contrary most of our guest see the Westin as their home away from home.

Kind regards, and Happy New Year.

Be Well,
Mik Mahdavi

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From: doraadkins7@aol.com <doraadkins7@aol.com>
Sent: Friday, December 31, 2021 7:56:11 PM
To: Mik Mahdavi <mmahdavi@dhmhotels.com>
Cc: DoraAdkins7@aol.com <DoraAdkins7@aol.com>
Subject: Fwd: Dirty Carpet Inside Guest Room #438 and Very Offensive Smells on the 4th Floor

Dear Mr. Mahdavi:

The worst was about to come my way inside Guest Room #438.

I sent you an email and prepared to go to sleep but before such I went to take a shower and the bathroom shower is not working nor is the commode located in the bathroom with something in it that has not been flushed. ARE YOU KIDDING ME!!! I CLOSED THE DOOR AND WILL HAVE NO PLACE TO WASH MY FACE AND BRUSH MY TEETH.

Rahan when asked if Guest Room # 438 had pets on the floor Rahan indicated "No." THERE IS A BARKING DOG ON THE 4TH FLOOR.

Sincerely,

Dora Adkins

NOTE: I AM ATTEMPTING TO GET RID OF THE SWELLING IN MY LEGS, FEET AND ANKLES BEFORE HEART PROBLEMS EXIST.

Sincerely,

Dora Adkins

NOTE: DEAR GM, PLEASE HELP ME WITH A GUEST ROOM WITHOUT THESE ISSUES.

-----Original Message-----

From: doraadkins7@aol.com
To: mmahdavi@dhmhotels.com <mmahdavi@dhmhotels.com>
Cc: DoraAdkins7@aol.com <DoraAdkins7@aol.com>
Sent: Fri, Dec 31, 2021 7:08 pm
Subject: Fwd: Dirty Carpet Inside Guest Room #438 and Very Offensive Smells on the 4th Floor

WRONG EMAIL ADDRESS

-----Original Message-----

From: doraadkins7@aol.com

To: Mmahdaui@dhmhotels.com <Mmahdaui@dhmhotels.com>

Cc: DoraAdkins7@aol.com <DoraAdkins7@aol.com>

Sent: Fri, Dec 31, 2021 7:06 pm

Subject: Dirty Carpet Inside Guest Room #438 and Very Offensive Smells on the 4th Floor

December 31, 2021

Dear Mr. Mahdaui:

I just checked into the Westin Hotel Tyson's and while I requested a Guest Room without a pet being inside the Guest Room. My request could not be accommodated by Rahan. The carpet has **large dirty spots** on it; **visible lint** left from not proper vacuuming; and the hallway smells horrific to the point of making me vomit.

I have had no place to stay in the pass 16-days and nights and I desperately need sleep because my feet, ankles, and legs, are swollen from water retention and the lack of proper movement of the body.

I was able to switch out the bed linens because NOTHING can get onto my skin.

A very nice Housekeeper assisted me with the additional linen requests and sprayed the Guest Room down with some air freshener. She indicated that she too smelled the very offensive and disgusting smell and that it was coming from the Engineer who was working in the Hallway when I arrived to Guest Room #438. Why would such offensive work need to be completed late into the evening on New Year Eve?

Sincerely,

Dora Adkins